

JAP: AL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JEAN CARLOS TAVAREZ,

PRE-ARRAIGNMENT

C O M P L A I N T

(21 U.S.C. §§ 952(a)
and 960)

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GERARD MCMAHON, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 23, 2012, within the Eastern District of New York and elsewhere, defendant JEAN CARLOS TAVAREZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about June 23, 2012, defendant JEAN CARLOS TAVAREZ arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Airlines Flight No. 838 from Santiago, Dominican Republic.


2. During an examination, a Customs and Border ("CBP") Protection Officer noticed that defendant JEAN CARLOS TAVAREZ appeared unusually nervous and pale.

3. The defendant admitted to the CBP officer that he swallowed seventy-nine pellets of a drug, but that he did not know the type of drug that was inside the pellets. The defendant was presented with an x-ray consent form, which he read, appeared to understand and signed.

4. On June 23, 2012 at approximately 6:15 a.m., defendant JEAN CARLOS TAVAREZ passed 2 pellets, one of which field-tested positive for the presence of cocaine. The defendant JEAN CARLOS TAVAREZ was transported to the medical facility at John F. Kennedy International Airport, where an x-ray taken of the defendant's intestinal tract was positive for foreign bodies. Defendant JEAN CARLOS TAVAREZ was then placed under arrest.

5. Defendant JEAN CARLOS TAVAREZ will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that
defendant JEAN CARLOS TAVAREZ be dealt with according to law.


GERARD MCMAHON
Special Agent
HSI

Sworn to before me this
23rd day of June, 2012

EDGE
K